



EVALUATION - VIOLATION - ENFORCEMENT FORM 1

6-E

HANDLER										Date Submitted									
ID Number <u>W V D 0 0 0 7 9 7 7 2 0</u>										LDF[] TSF[] INC[] LOG[X] SQG[] TRA[]									
Handler Name																			
Wheeling-Pittsburgh Steel - Beech Bottom Plant															City				
Street															Wheeling, WV 26003				

06-9/8/93

EVALUATION										Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>																								
Date <u>010792</u>					Number <u> </u>					Agency <u>S</u>					Type <u>CEI</u>					Reason <u> </u>					Branch <u>C.M.</u>					Person <u>J.A.G.</u>				
Areas of Evaluation (EV - Evaluated, NE - Not Evaluated, NA - Not Applicable)																																		
GER <u> </u>		GOR <u>E, V</u>		TGR <u>N, A</u>		DCH <u>N, A</u>		DGW <u>N, A</u>		DMC <u>N, A</u>		DPP <u>N, A</u>		CAS <u> </u>		GEX <u> </u>		GPT <u>E, V</u>		TMR <u>N, A</u>		DCL <u>N, A</u>		DIN <u>N, A</u>		DMR <u>N, A</u>		DSI <u>N, A</u>		FEA <u> </u>				
GGR <u>E, V</u>		GRR <u>E, V</u>		TOR <u>N, A</u>		DCP <u>N, A</u>		DLB <u>N, A</u>		DOR <u>N, A</u>		DTR <u>N, A</u>				GLB <u>E, V</u>		GSC <u>E, V</u>		TRR <u>N, A</u>		DFR <u>N, A</u>		DLF <u>N, A</u>		DOT <u>N, A</u>		DTT <u>N, A</u>						
GMR <u>E, V</u>		GSQ <u>E, V</u>		TWD <u>N, A</u>		DGS <u>N, A</u>		DLT <u>N, A</u>		DPB <u>N, A</u>		DWP <u>N, A</u>																						
Comments																																		

VIOLATION										Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>																								
Agency <u>S</u>					Number <u>4</u>					Area <u>G.P.T</u>					Class <u>I</u>					Regulation Type <u>S.R</u>					Regulation Citation <u>40CFR 265.35 & 47CFR 35-6.3.5.a.5</u>									
Date Determined <u> </u>					Priority <u>4</u>					Branch <u>C.M.</u>					Person <u>J.A.G.</u>					Returned to Compliance Scheduled <u> </u>					Actual <u>05/07/92</u>									
Comments <u>aisle spacing</u>																																		

VIOLATION										Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>																								
Agency <u>S</u>					Number <u>5</u>					Area <u>G.P.T</u>					Class <u>I</u>					Regulation Type <u>S.R</u>					Regulation Citation <u>47CFR 35-6.3.5.b</u>									
Date Determined <u> </u>					Priority <u>6</u>					Branch <u>C.M.</u>					Person <u>J.A.G.</u>					Returned to Compliance Scheduled <u> </u>					Actual <u> </u>									
Comments <u>OVER 90 DAY STORAGE</u>																																		

VIOLATION										Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>																								
Agency <u>S</u>					Number <u>6</u>					Area <u>G.P.T</u>					Class <u>I</u>					Regulation Type <u>S.R</u>					Regulation Citation <u>47CFR 35-6.3.5.a.3 & 4</u>									
Date Determined <u> </u>					Priority <u>8</u>					Branch <u>C.M.</u>					Person <u>J.A.G.</u>					Returned to Compliance Scheduled <u> </u>					Actual <u> </u>									
Comments <u>No LABEL</u>																																		

VIOLATION										Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>																								
Agency <u>S</u>					Number <u>7</u>					Area <u>G.L.B</u>					Class <u>I</u>					Regulation Type <u>S.R</u>					Regulation Citation <u>40CFR 268.7(a)(6) & 47CFR 35-7</u>									
Date Determined <u> </u>					Priority <u>8</u>					Branch <u>C.M.</u>					Person <u>J.A.G.</u>					Returned to Compliance Scheduled <u> </u>					Actual <u> </u>									
Comments <u>No LBR Form</u>																																		

EVALUATION - VIOLATION - ENFORCEMENT FORM

ID Number			Handler Name		
W V D 0 0 0 7 9 7 7 2 0			Wheeling Pittsburgh Steel- Beech Bottom Plant		
VIOLATION			Add <input checked="" type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>
Agency <input type="checkbox"/>	Number <input type="checkbox"/>	Area <input type="checkbox"/>	Class <input type="checkbox"/>	Regulation Type <input type="checkbox"/>	Regulation Citation
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Date Determined <input type="checkbox"/>		Priority <input type="checkbox"/>	Branch <input type="checkbox"/>	Person <input type="checkbox"/>	Returned to Compliance <input type="checkbox"/>
<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments <input type="checkbox"/>					
VIOLATION					
Add <input checked="" type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>			
Agency <input type="checkbox"/>	Number <input type="checkbox"/>	Area <input type="checkbox"/>	Class <input type="checkbox"/>	Regulation Type <input type="checkbox"/>	Regulation Citation
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Date Determined <input type="checkbox"/>		Priority <input type="checkbox"/>	Branch <input type="checkbox"/>	Person <input type="checkbox"/>	Returned to Compliance <input type="checkbox"/>
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Comments <input type="checkbox"/>					
VIOLATION					
Add <input type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>			
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Agency <input type="checkbox"/>	Number <input type="checkbox"/>	Area <input type="checkbox"/>	Class <input type="checkbox"/>	Regulation Type <input type="checkbox"/>	Regulation Citation
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Date Determined <input type="checkbox"/>		Priority <input type="checkbox"/>	Branch <input type="checkbox"/>	Person <input type="checkbox"/>	Returned to Compliance <input type="checkbox"/>
<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Comments <input type="checkbox"/>					
ENFORCEMENT					
Add <input type="checkbox"/>	Change <input type="checkbox"/>	Delete <input type="checkbox"/>			
Date <input type="checkbox"/>	Number <input type="checkbox"/>	Agency <input type="checkbox"/>	Type <input type="checkbox"/>	Branch <input type="checkbox"/>	Person <input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Penalty Assessed <input type="checkbox"/>		Settled <input type="checkbox"/>			
<input type="checkbox"/>		<input type="checkbox"/>			
COVERED VIOLATIONS					
Agency <input type="checkbox"/>	Number <input type="checkbox"/>	Area <input type="checkbox"/>	Agency <input type="checkbox"/>	Number <input type="checkbox"/>	Area <input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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PENALTY PAYMENTS					
Date <input type="checkbox"/>	Amount <input type="checkbox"/>	Date <input type="checkbox"/>	Amount <input type="checkbox"/>		
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
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Comments <input type="checkbox"/>					



EVALUATION - VIOLATION - ENFORCEMENT FORM I

HANDLER										Date Submitted			
ID Number <u>W V D 0 0 0 7 9 7 7 2 0</u>										LDF[] TSF[] INC[] LOG[X] SQG[] TRA[]			
Handler Name <u>Wheeling-Pittsburgh Steel - Beech Bottom Plant</u>													
Street <u>1134 Market Street</u>										City <u>Wheeling, WV 26003</u>			
EVALUATION Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>													
Date <u>010792</u>		Number <u> </u>		Agency <u>S</u>		Type <u>CEI</u>		Reason <u> </u>		Branch <u>C.M.</u>		Person <u>J.A.G.</u>	
Areas of Evaluation (EV - Evaluated, NE - Not Evaluated, NA - Not Applicable)													
GER <u> </u>	GOR <u>E, V</u>	TGR <u>N, A</u>	DCH <u>N, A</u>	DGW <u>N, A</u>	DMC <u>N, A</u>	DPP <u>N, A</u>	CAS <u> </u>						
GEX <u> </u>	GPT <u>E, V</u>	TMR <u>N, A</u>	DCL <u>N, A</u>	DIN <u>N, A</u>	DMR <u>N, A</u>	DSI <u>N, A</u>	FEA <u> </u>						
GGR <u>E, V</u>	GRR <u>E, V</u>	TOR <u>N, A</u>	DCP <u>N, A</u>	DLB <u>N, A</u>	DOR <u>N, A</u>	DTR <u>N, A</u>							
GLB <u>E, V</u>	GSC <u>E, V</u>	TRR <u>N, A</u>	DFR <u>N, A</u>	DLF <u>N, A</u>	DOT <u>N, A</u>	DTT <u>N, A</u>							
GMR <u>E, V</u>	GSQ <u>E, V</u>	TWD <u>N, A</u>	DGS <u>N, A</u>	DLT <u>N, A</u>	DPB <u>N, A</u>	DWP <u>N, A</u>							
Comments <u> </u>													
VIOLATION Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>													
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Date Determined <u> </u>		Priority <u>7</u>		Branch <u>C.M.</u>		Person <u>J.A.G.</u>		Returned to Compliance Scheduled <u> </u>		Actual <u> </u>			
Comments <u>aisle spacing</u>													
VIOLATION Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>													
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Comments <u>OVER 90 DAY STORAGE</u>													
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Date Determined <u> </u>		Priority <u>8</u>		Branch <u>C.M.</u>		Person <u>J.A.G.</u>		Returned to Compliance Scheduled <u> </u>		Actual <u> </u>			
Comments <u>No LABEL</u>													
VIOLATION Add <input checked="" type="checkbox"/> Change <input type="checkbox"/> Delete <input type="checkbox"/>													
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Date Determined <u> </u>		Priority <u>8</u>		Branch <u>C.M.</u>		Person <u>J.A.G.</u>		Returned to Compliance Scheduled <u> </u>		Actual <u> </u>			
Comments <u>No LBR Form</u>													



STATE OF WEST VIRGINIA
DEPARTMENT OF COMMERCE, LABOR AND ENVIRONMENTAL RESOURCES
WASTE MANAGEMENT SECTION

1356 Hansford Street
Charleston, West Virginia 25301
Telephone (304)348-5929

March 2, 1992

GASTON CAPERTON
Governor

J. EDWARD HAMRICK III
Director

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

ANN A. SPANER
Deputy Director

Jeffrey McKinney
Wheeling-Pittsburgh Steel Corporation
1134 Market Street
Wheeling, West Virginia 26003

Dear Mr. McKinney:

Enclosed is a copy of the **Compliance Evaluation Inspection (CEI) Report** completed on your facility by representatives of the Chief of the Waste Management Section. This report is based on the inspection conducted on January 7, 1992.

Please refer to the **Violations/Notice of Violation** sections of the report for those violations discovered during the course of this inspection.

A copy of this report has been referred to the Administrative Enforcement Unit of this Section for further action, and also, a copy is being transmitted to the United States Environmental Protection Agency (U.S. EPA), Region III, Philadelphia, Pennsylvania.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or the attached report, please feel free to contact this office at (304) 348-5989.

Sincerely,

A handwritten signature in dark ink, appearing to read "H. Michael Dorsey".

H. Michael Dorsey
Assistant Chief
Compliance Monitoring/Enforcement

HMD/kw

Enclosures

cc: Naomi Henry, U.S. EPA Region III
Civil and Administrative Enforcement Unit
Jim Gaston, Inspector
File

INSPECTION FACT SHEET

COMPANY NAME: Wheeling Pittsburgh Steel Corp I.D.: WVD000797720

MAILING ADDRESS: 1134 Market Street
Wheeling, WV 26003

TYPE OF FACILITY: Generator

LOCATION: WV Rt. 2
Beech Bottom, WV.505

COUNTY: Brooke (009)

COMPANY CONTACT: Mr. Jeffrey McKinney

CODES: S01

PHONE: (304) 234-2685

PURPOSE: Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 20-5E;
West Virginia Administrative Regulations for Chapter 20-5E;
and/or 40 CFR Part 265.

LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)

 X VIOLATIONS

DATE INSPECTED: 7 January 1992

 NO VIOLATIONS

INSPECTOR(S): (1) James A. Gaston, West Virginia Department of Natural
Resources, Division of Waste Management, Wheeling
Field Office.
(2) Pamela S. Beltz, WV DNR-WMS, Wheeling Field Office.

DATE PREPARED: 15 January 1992

PREPARED BY: James A. Gaston, Division of Waste Management

RECEIVED

FEB 10 1992

DEPT. OF NATURAL RESOURCES
DIVISION OF WASTE MANAGEMENT

COMPLIANCE EVALUATION INSPECTION

RE: Wheeling Pittsburgh Steel
 Beech Bottom Plant

DATE INSPECTED: 7 January 1992

INSPECTORS: James A. Gaston, WV DNR-WMS
 Pamela S. Beltz, WV DNR-WMS

DATE PREPARED: 15 January 1992

PREPARED BY: James A. Gaston

On January 7, 1992 at approximately 10:15 hours the above referenced inspectors conducted a Compliance Evaluation Inspection of Wheeling Pittsburgh Steel Corporation's Beech Bottom Plant.

Upon our arrival we were met by Mr. Jim Howell, Superintendent of Maintenance and Services, who had not previously been advised of our intention to inspect the facility. Later in the inspection we were joined by Mr. Jeffrey McKinney, Environmental Coordinator.

Upon presentation of the appropriate credentials, the company officials were informed of our authority as representatives of the Chief of the Waste Management Section pursuant to Chapter 20 of the Code of West Virginia and as specified by Section 3007 (a) of the Resource Conservation and Recovery Act; and they acknowledged our authority. The company officials were informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E), and the regulations promulgated thereunder.

The machinery used for producing expanded metal grating has been sold to a firm in Mexico. This portion of the plant is now inactive.

This inspection started with a visit to the hazardous waste storage area which is contained in a building at the south end of the facility. This building contained many drums, most of which contained used oil. Oil spillage was noted on the southeast corner of the building (see Photo #4). An oil boom had been placed in the corner but no cleanup had taken place. No attempt to identify or isolate the source of the spilled material had been made. A composite sample of the used oil is made before shipping off-site.

The drums containing hazardous waste were in three non-uniform rows (see Photo #5). These rows exhibited insufficient aisle spacing which hindered inspection of the drums. One drum containing asbestos, one drum of scrap galvanized flakes, one drum containing floor-dry and oil, and four drums containing waste grinder oil were mixed in with the drums containing hazardous waste. A tracking system which includes the use of painting identification numbers is used at the Beech Bottom Plant. Two drums had been identified as #79. The tracking document stated that drum #79 contained rags. In actuality, one drum marked #79 contained roll grindings and the other drum

marked #79 appeared to be floor-dry used in oil spill cleanup. One of the drums marked #79 was dated 9-10-91; this drum contained rubber roll grindings. Analysis of roll grindings similar to those contained in drum #79 exhibited high levels of lead (see Att. "C"). Drum #79 had exceeded the 90-day storage limit. This drum also did not exhibit a hazardous waste label (see Photo #3). The second drum marked #79 exhibited a hazardous waste label identifying the material as D005/D007/D008/D035 (rags with paint waste), but actually contained floor-dry from an oil clean-up (see Photos #1 & #2).

A visit to the paint lines revealed no violations during this inspection.

A review of manifests revealed that manifest document #KC001 (see Att. "D") did not have a Land Ban form attached to it. This shipment contained material identified as D001/D018. During the initial inspection of manifests, no Land Ban form was found for manifest document #BI010. This form was later found in the guardhouse.

The annual report was not found on-site. Mr. McKinney stated that this report is maintained at the Wheeling Corporate Office. A review of training records revealed that no training has been documented since 1989. A review of the contingency plan revealed that the required list and location map of emergency and spill equipment were not present.

Mr. McKinney informed us that a review of past samples of the waste water treatment sludge has prompted the Beech Bottom Plant to handle this sludge as a nonhazardous solid waste (see Att. "E").

On January 10, 1992 this inspector visited Mr. McKinney at Wheeling Pittsburgh Steel's Corporate Office. Mr. McKinney explained that the one drum that had exceeded the 90-day storage limit was to have been picked up on a "milk run" that included the Martins Ferry Plant. When the Martins Ferry Plant canceled their pickup the hauler was not told to continue the route. The paper work review was then continued from the plant inspection. This inspector received a copy of the 1990 annual reports for all three of Wheeling Pitt's plants in West Virginia. Note: The Hazardous Waste Emergency Response Fund Fee Assessment Report was not signed (see Att. "F-5"). EPA ID# on annual report is wrong.

Mr. McKinney supplied a copy of the waste analysis conducted on both the rubber roll grindings and the waste water treatment sludge. No analysis was found for the scrap galvanize flakes. No analysis were on file for the composite waste oil samples that are taken, but Mr. McKinney stated that he would get copies of the analysis from the oil handling company and send them to the Wheeling Field Office.

Page 3
15 January 1992
Wheeling Pittsburgh Steel

No employee training records were found for 1990 or 1991. Mr. McKinney produced a document that discussed the potential material to be covered in an upcoming employee training session scheduled to be held on June 10, 1991; however no evidence exists to show that the training had actually occurred.

AREAS OF CONCERN

A clean-up of the oil spill in the southeast end of the drum storage building needs to be immediately initiated. The source of the spillage needs to be identified and the leak stopped.

Old "Hazardous Waste" labels must be removed from drums that are reused for nonhazardous waste.

Drums of nonhazardous waste should be segregated from the hazardous waste section to prevent confusion.

VIOLATIONS

- 1) The hazardous waste storage area exhibited inadequate aisle space to allow unobstructed movement of personnel and equipment as required by 40 CFR 265.35 as referenced by 47 CSR 35-6.3.5.a.5.
- 2) Hazardous waste was stored on site over the 90-day limit without requesting an extension and without a permit in violation of 47 CSR 35-6.3.5.b.
- 3) A drum containing hazardous waste (D008) did not exhibit a hazardous waste label in violation of 47 CSR 35-6.3.5.a.3 and 4.
- 4) The Beach Bottom Plant did not maintain a record of the Land Ban form in violation of 40 CFR 268.7 (a) (6) as referenced by 47 CSR 35-7.
- 5) No evidence or records of employee training were offered for 1990 or 1991 in violation of 40 CFR 265.16 as referenced by 47 CSR 35-6.3.5.a.5.
- 6) The contingency plan did not have a list of emergency equipment and their location in violation of 40 CFR 265.52 (e) as referenced by 47 CSR 35-6.3.5.a.5.

CONCLUSION

These violations will be forwarded to the Enforcement Office for further review/action.

BEECH BOTTOM PLANT
WHEELING PITTSBURGH
WVD000797720 AT "A"

TILTONSVILLE, OHIO - W. VA.

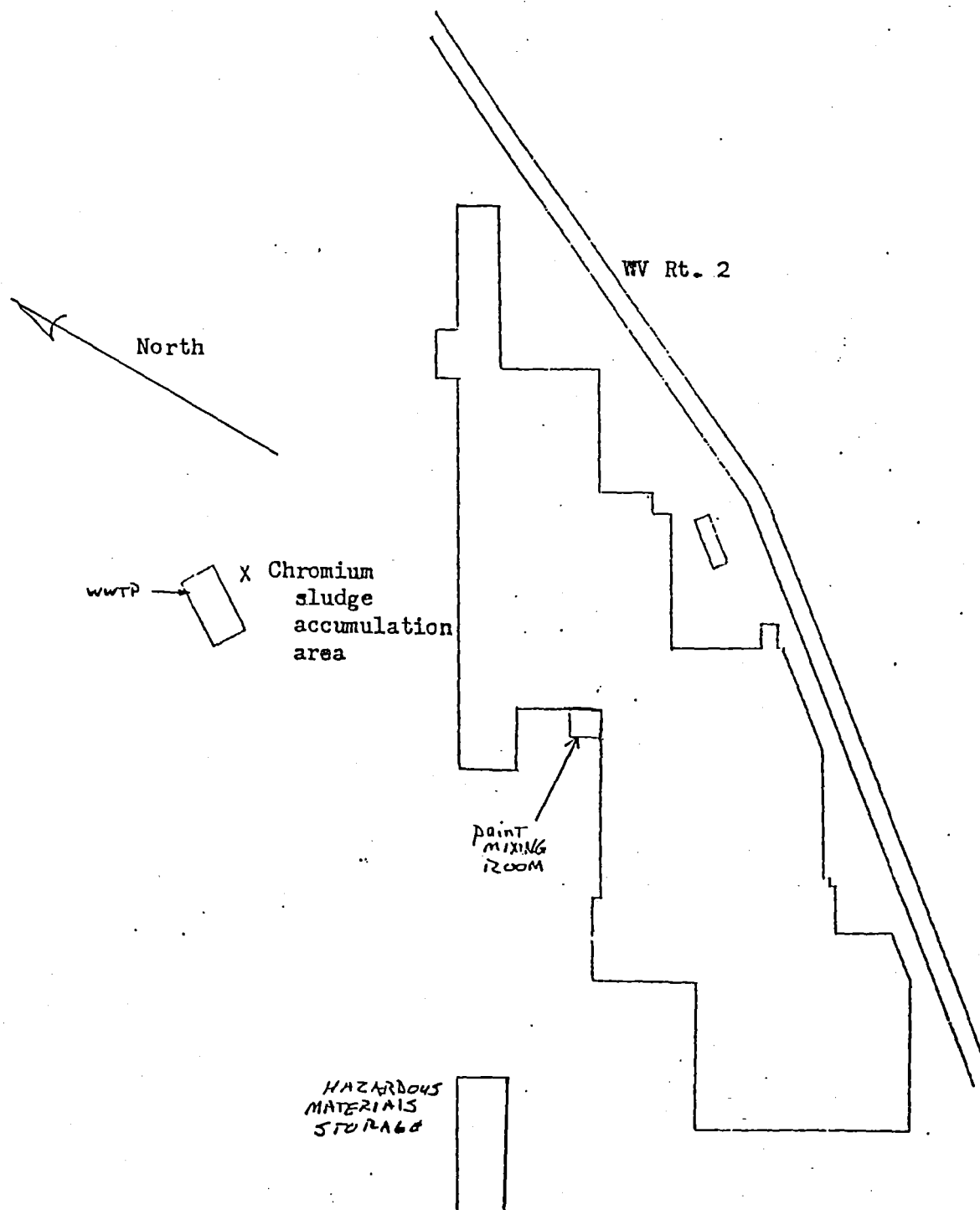
N4007.5 - W8037.5/7.5

1968

PHOTOREVISED 1973

AMS 4664 II NW - SERIES V854

ATTACHMENT "B"
SITE MAP
BEECH BOTTOM PLANT
WHEELING PITTSBURGH
WVD000797720



* MAP NOT TO SCALE

FOR MR. 3500062
03108

Wheeling Pittsburgh
STEEL CORPORATION



INTEROFFICE CORRESPONDENCE

To: J. M. Howell (BB01)

DATE: June 14, 1991

FROM: Martin Stephenson
Environmental Control

Re: Hazardous Waste Issues
Beech Bottom, WV Facility

Attached is are the results of analysis done on a sample of the roll grinding dust generated at the Beech Bottom plant. The results indicate that the dust is a DO08 hazardous waste as defined by USEPA for lead.

This waste stream will require treatment and disposal. Please collect three one-quart jars of this material. Each jar will be sent to the organizations listed below to gain approval of the waste stream.

1. American Waste Services, Inc. (Disposal at Michigan Disposal)
2. Autumn, Inc. (Disposal at Chemical Waste Mgmt)
3. Stout Environmental Services (Disposal at Ecolotec, Inc.)

A requisition should be placed ASAP for disposal. Joe Hurley will be the buyer.

Enclosed are five hazardous waste labels. You only have to fill in the date of accumulation and stick the label to the drum.

Please have the jars available by Monday June 17, 1991.

If you have any questions, do not hesitate to call.

Thank you.

cc:

D. Lehman (BB01 w/ analysis)
E. Maziak (BB01 w/ analysis)
J. Allen (BB01 w/ analysis)
S. Beecroft (BB01 w/ analysis)
J. Hurley (W10A w/ analysis)
TJW/WRS/B.B. 1991 Haz. Waste MFILE

Part 7

Note: All labels were sent to J.M. Howell

LEAD IS FROM LEAD OXIDE USED AS CURING
AGENT IN THE HYPALON. PER DAN SULLIVAN,
INDUSTRIAL RUBBER, THE HYPALON CAN BE MADE
INDIC - LEAD - PROPERTIES NOT AS

je 3
ceived: 05/13/91

KEMRON
Results by Sample

Work Order # N1-05-205

SAMPLE ID Grinding Dust

FRACTION 01A TEST CODE TC ME NAME TCLP Metals

Date & Time Collected 05/04/91 Category SOLID

TCLP EXTRACTION DATE: 05/28/91

UNITS: mg/L VERIFIED: CLC

EPA HW#	CAS#	COMPOUND NAME	RESULT	REGULATORY LIMIT
D004	7440-38-2	Arsenic	<0.04	5.0
D005	7440-39-3	Barium	<1	100.0
D006	7440-43-9	Cadmium	<0.1	1.0
D007	7440-47-3	Chromium	0.5	5.0
D008	7439-92-1	Lead	790	5.0
D009	7439-97-6	Mercury	<0.005	0.2
D010	7782-49-2	Selenium	<0.04	1.0
D011	7440-22-4	Silver	<0.4	5.0
		Nickel	0.5	
		Zinc	7.8	

NOTES AND DEFINITIONS FOR THIS REPORT.
NA = NOT ANALYZED

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. WV D 0 0 0 7 9 7 7 2 0 K C 0 0 1		Manifest Document No. 1		2. Page 1 of 1		Information in the shaded areas is not required by Federal law but is required by State law.					
3. Generator's Name and Mailing Address WHEELING-PITTSBURGH STEEL CORP. ROUTE 2, BEECH BOTTOM, WV 26030						A. State Manifest Document Number PAC 4363741							
						B. State Gen. ID WVD 000 797 720							
4. Generator's Phone (304) 234-2685 OR (304) 234-7628						C. State Trans. ID PA-1AR10109							
5. Transporter 1 Company Name PETROCLEAN, INC.						6. US EPA ID Number PA D 0 9 8 4 3 1 8 8 5							
7. Transporter 2 Company Name						8. US EPA ID Number							
9. Designated Facility Name and Site Address KEYSTONE CEMENT COMPANY ROUTE 329 BATH, PA 18014						10. US EPA ID Number PA D 0 0 2 3 8 9 5 5 9							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit		15. Waste No.	
						No. Type		Quantity		Wt/Vol		Waste No.	
a. RQ, WASTE FLAMMABLE LIQUID, N.O.S., (GASOLINE, NAPHTHA), FLAMMABLE LIQUID, UN 1993						0 0 1 TT		05200		G		D 0 0 1 / D 0 1 8	
c. This shipment contains hazardous waste which is restricted or prohibited from land disposal under 40 CFR 261.2.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
Lab Pack		Physical State		Lab Pack		Physical State		a. 302		b.		c.	
a.				c.									
b.				d.									
15. Special Handling Instructions and Additional Information													
Acceptance approval via Petroclean, Inc. generic approval. Emergency Response Guide #27. EMERGENCY CONTACT: Petroclean, Inc. (24 hours) (412) 279-9556						NOTE: RETURN COPY 3 TO: WHEELING-PITTSBURGH STEEL CORP. 1134 MARKET ST. WHEELING, WV 26003 IF UNDELIVERABLE: RETURN TO GENERATOR							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.													
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name WHEELING-PITTSBURGH STEEL CORP.						Signature <i>[Signature]</i>				MONTH DAY YEAR 11 05 91			
17. Transporter 1 Acknowledgement of Receipt of Materials						18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name W. W. WYLAND						Signature <i>[Signature]</i>				MONTH DAY YEAR 11 10 91			
Printed/Typed Name						Signature				MONTH DAY YEAR			
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name L. M. STOUT						Signature <i>[Signature]</i>				MONTH DAY YEAR 11 10 91			

INTEROFFICE CORRESPONDENCE

SC 1802 REV 9-89

To: J. Allen
J. Howell
D. Strickler

Date: November 26, 1991

From: Jeff McKinney
Environmental Control Dept.

RE: **CHARACTERIZATION OF BEECH BOTTOM
WASTEWATER TREATMENT SLUDGE
IDENTIFIED BY KEMRON ANALYSIS UNDER
WORK ORDER # N1-11-136**

According to the analytical results, the wastewater treatment sludge from the Beech Bottom facility is no longer defined as a USEPA Hazardous Waste per 40 CFR 261. Disposal may be contracted with a suitable non-hazardous landfill permitted to accept this material.

Jeff 

JMM/cr
Analysis attached

cc: T. Bottorf
TJM/WRS/MFile

Page 1
Received: 11/08/91

KEMRON

REPORT

Work Order # N1-11-136

11/26/91 13:44:05

REPORT Wheeling-Pittsburgh Steel
TO 1134 Market St.
Wheeling, WV 26003

PREPARED KEMRON ENVIRONMENTAL SERVICES
BY 109 STARLITE PARK
MARIETTA, OHIO 45750

ATTEN Jeff McKinney

ATTEN _____
PHONE (614) 373-4071

CERTIFIED BY _____

CLIENT WHEPIT 59500 SAMPLES 1
COMPANY Wheeling-Pittsburgh Steel
FACILITY Wheeling, WV
FAX # 304-234-2613

ANALYTICAL METHODS AND DOCUMENTATION ARE FOUND AT THE END OF
THIS REPORT. ALL RESULTS ON SOILS/SLUDGES ARE REPORTED
"AS RECEIVED" UNLESS OTHERWISE SPECIFIED.

CONTACT M WELCH

WORK ID #1 Beech Bottom WWTP Sludge
TAKEN Client
TRANS UPS
TYPE _____
P.O. # _____
INVOICE under separate cover

SAMPLE IDENTIFICATION
01 #1 Beech Bttm.Sludge

TEST CODES and NAMES used on this workorder

<u>CN S</u>	<u>Cyanide, Total</u>
<u>CU S</u>	<u>Copper, Total</u>
<u>FLASH</u>	<u>Ignitability</u>
<u>PB S</u>	<u>Lead, Total</u>
<u>PCB S</u>	<u>Polychlorinated Biphenyls</u>
<u>PCT SC</u>	<u>% Solids - Client Request</u>
<u>PFLT</u>	<u>Paint Filter Liquids Test</u>
<u>PH LS</u>	<u>pH (Lab) - Solid Matrix</u>
<u>REACTC</u>	<u>Cyanide Reactivity</u>
<u>REACTS</u>	<u>Sulfide Reactivity</u>
<u>TC EX</u>	<u>TCLP Extraction - Regular</u>
<u>TC ME</u>	<u>TCLP Metals</u>
<u>TC SV</u>	<u>TCLP Semivolatiles</u>
<u>TC VOA</u>	<u>TCLP Volatile Compounds</u>
<u>TC ZHE</u>	<u>TCLP Zero Headspace Extr.</u>
<u>TPH S</u>	<u>Petroleum Hydrocarbons</u>
<u>ZN S</u>	<u>Zinc, Total</u>

PRELIMINARY

SAMPLE ID #1 Beech Bttm.Sludge		SAMPLE # 01		FRACTIONS: A	
Date & Time Collected 11/06/91 10:00:00				Category SLUDGE	
CN_S	<0.5 mg/kg CN	CU_S	12 mg/kg Cu	FLASH	>95 Degrees C
PB_S	<10 mg/kg Pb	PCT_SC	25 % wt.	PFLT	No Liqui
PH_LS	8.6 S.U.	REACTC	<10 mg/kg HCN	REACTS	<100 mg/kg H2S
TPH_S	200 mg/kg	ZN_S	1200 mg/kg Zn		

E-31

SAMPLE ID #1 Beech Bttm.Sludge FRACTION 01A TEST CODE PCB S NAME Polychlorinated Biphenyls
Date & Time Collected 11/05/91 10:00:00 Category SLUDGE

ANALYST: SLN EXTRACTED: 11/12/91 FILE #: 5898
INSTRMT: HP_IV INJECTED: 11/14/91 FACTOR: 660 * UNITS: ug/kg VERIFIED: RJW

CAS#	COMPOUND	RESULT	DET LIMIT
12674-11-2	Aroclor-1016	BDL	330
11104-28-2	Aroclor-1221	BDL	330
11141-16-5	Aroclor-1232	BDL	330
53469-21-9	Aroclor-1242	BDL	330
12672-29-6	Aroclor-1248	BDL	330
11097-69-1	Aroclor-1254	BDL	660
11096-82-5	Aroclor-1260	BDL	660

NOTES AND DEFINITIONS FOR THIS REPORT.

DET LIMIT = DETECTION LIMIT

BDL=BELOW DETECTION LIMIT

NA =NOT ANALYZED

* = ELEVATED DETECTION LIMIT DUE TO SAMPLE MATRIX.

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Received: 11/08/91

KEMRON
Results by Sample

REPORT

Work Order # N1-11-136

SAMPLE ID #1 Beech Bttm.Sludge

FRACTION 01A

TEST CODE TC ME

NAME TCLP Metals

Date & Time Collected 11/06/91 10:00:00

Category SLUDGE

TCLP EXTRACTION DATE: 11/11/91

UNITS: mg/L VERIFIED: CLC

EPA HW#	CAS#	COMPOUND NAME	RESULT	REGULATORY LIMIT
D004	7440-38-2	Arsenic	0.05	5.0
D005	7440-39-3	Barium	<1	100.0
D006	7440-43-9	Cadmium	<0.1	1.0
D007	7440-47-3	Chromium	<0.2	5.0
D008	7439-92-1	Lead	<2	5.0
D009	7439-97-6	Mercury	<0.005	0.2
D010	7782-49-2	Selenium	<0.04	1.0
D011	7440-22-4	Silver	<0.4	5.0
		Nickel	2.2	
		Zinc	0.9	

NOTES AND DEFINITIONS FOR THIS REPORT.

NA = NOT ANALYZED

SAMPLE ID #1 Beech Bttm.Sludge

FRACTION 01A TEST CODE TC SV NAME TCLP Semivolatiles
Date & Time Collected 11/06/91 10:00:00 Category SLUDGE

ANALYST: SDF EXTRACTED: 11/18/91 FILE #: 1WP17307 TCLP EXTRACTION DATE: 11/11/91
INSTRMT: FINN1 INJECTED: 11/23/91 FACTOR: 4 UNITS: ug/L VERIFIED: RJW

EPA HW#	CAS#	COMPOUND NAME	RESULT	DET LIMIT	REGULATORY LIMIT
D023	95-48-7	o-Cresol	BDL	20	200000
D024	108-39-4	m-Cresol*	BDL	20	200000
D025	106-44-5	p-Cresol*	BDL	20	200000
D027	106-46-7	1,4-Dichlorobenzene	BDL	20	7500
D030	121-14-2	2,4-Dinitrotoluene	BDL	20	130
D032	118-74-1	Hexachlorobenzene	BDL	20	130
D033	87-68-3	Hexachlorobutadiene	BDL	20	500
D034	67-72-1	Hexachloroethane	BDL	20	3000
D036	98-95-3	Nitrobenzene	BDL	20	2000
D037	87-86-5	Pentachlorophenol	BDL	100	100000
D038	110-86-1	Pyridine	BDL	100	5000
D041	95-95-4	2,4,5-Trichlorophenol	BDL	20	400000
D042	88-06-2	2,4,6-Trichlorophenol	BDL	20	2000

NOTES AND DEFINITIONS FOR THIS REPORT

DET LIMIT = DETECTION LIMIT

BDL = BELOW DETECTION LIMIT

* = UNRESOLVEABLE COMPOUNDS

Page 6
Received: 11/08/91

KEMRON
Results by Sample

Work Order # N1-11-136

SAMPLE ID #1 Beech Bttm.Sludge FRACTION 01A TEST CODE TC VOA NAME TCLP Volatile Compounds
Date & Time Collected 11/06/91 10:00:00 Category SLUDGE

ANALYST: JPM FILE #: 2WP21359 TCLP EXTRACTION DATE: 11/11/91
INSTRMT: FINN2 INJECTED: 11/20/91 FACTOR: 1 UNITS: ug/L VERIFIED: RJW

EPA HW#	CAS#	COMPOUND NAME	RESULT	DET LIMIT	REGULATORY LIMIT
D018	71-43-2	Benzene	BDL	5.0	500
D019	56-23-5	Carbon tetrachloride	BDL	5.0	500
D021	108-90-7	Chlorobenzene	BDL	5.0	100000
D022	67-66-3	Chloroform	BDL	5.0	6000
D028	107-06-2	1,2-Dichloroethane	BDL	5.0	500
D029	75-35-4	1,1-Dichloroethene	BDL	5.0	700
D035	78-93-3	Methyl ethyl ketone	BDL	100	200000
D039	127-18-4	Tetrachloroethene	BDL	5.0	700
D040	79-01-6	Trichloroethene	BDL	5.0	500
D043	75-01-4	Vinyl chloride	BDL	10	200

NOTES AND DEFINITIONS FOR THIS REPORT
DET LIMIT = DETECTION LIMIT
BDL = BELOW DETECTION LIMIT
* = SEMI-QUANTITATIVE SCREEN ONLY

Wheeling-Pittsburgh Steel

ANALYTICAL DOCUMENTATION

PARAMETER	ANALYST	ANALYSIS DATE
CN_S	REB	11/18/91
CU_S	PNW	11/25/91
FLASH	DIH	11/13/91
PB_S	PNW	11/25/91
PCT_SC	PDL	11/12/91
PFLT	DIH	11/13/91
PH_LS	DIH	11/13/91
REACTC	REB	11/19/91
REACTS	WMW	11/19/91
TPH_S	ECL	11/20/91
ZN_S	PNW	11/25/91

7-8

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:SITE NAME Wheeling-Pittsburgh Steel Corp.
Beech Bottom PlantEPA ID NO. WV D 0 0 0 7 9 7 7 2 0 ← *WRONG*
WV D 0 0 0 7 9 7 7 2 0U.S. ENVIRONMENTAL
PROTECTION AGENCY1990
1989 Hazardous Waste ReportFORM
ICIDENTIFICATION AND
CERTIFICATION

INSTRUCTIONS: Read the detailed instructions beginning on page 7 of the 1989 Hazardous Waste Report booklet before completing this form.

SEC. I Site name and location address. Complete items A through H. Check the box ☒ in items A, B, D, E, F, G, and H if same as label; if different, enter corrections. If label is absent, enter information. Instruction page 7.

A. EPA ID No. Same as label <input type="checkbox"/> or <u>WV D 0 0 0 7 9 7 7 2 0</u> <u>WV D 0 0 0 7 9 7 7 2 0</u>		B. Site/company name Same as label <input type="checkbox"/> or <u>Wheeling-Pittsburgh Steel Corp</u>	
C. Has the site name associated with this EPA ID changed since 1987? <input type="checkbox"/> 1 Yes <input checked="" type="checkbox"/> 2 No			
D. Street name and number. If not applicable, enter industrial park, building name or other physical location description. Same as label <input type="checkbox"/> or <u>Route 2</u>			
E. City, town, village, etc. Same as label <input type="checkbox"/> or <u>Beech Bottom</u>	F. County <u>Brooke</u>	G. State Same as label <input type="checkbox"/> or <u>WV</u>	H. Zip Code Same as label <input type="checkbox"/> or <u>26103</u>

SEC. II Mailing address of site. Instruction page 7.

A. Is the mailing address the same as the location address? <input type="checkbox"/> 1 Yes (SKIP TO SEC. III) <input checked="" type="checkbox"/> 2 No (COMPLETE SEC. II)	
B. Number and street name of mailing address <u>1134 Market Street</u>	
C. City, town, village, etc. <u>Wheeling</u>	D. State <u>WV</u>
E. Zip Code <u>26103</u>	

SEC. III Name, title, and telephone number of the person who should be contacted if questions arise regarding this report. Instruction page 7.

A. Please print: Last name <u>Stephenson</u>	First name <u>Martin</u>	M.I. <u>J.</u>	B. Title <u>Env. Coord. I</u>	C. Telephone <u>304</u> <u>234</u> - <u>2685</u> Extension <u> </u>
---	-----------------------------	-------------------	----------------------------------	--

SEC. IV Enter the Standard Industrial Classification (SIC) Code that describes the principal products, group of products, produced or distributed, or the services rendered at the site's physical location. Enter more than one SIC Code only if no one industry description includes the combined activities of the site. Instruction page 8.

A. <u>3479</u>	B. <u> </u>	C. <u> </u>	D. <u> </u>
----------------	----------------	----------------	----------------

SEC. V I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Number of form pages submitted Form IC <u>2</u> Form GM <u>3</u> Form WR <u> </u> Form PB <u> </u>			
B. Please print: Last name <u>Stephenson</u>	First name <u>Martin</u>	M.I. <u>J.</u>	C. Title <u>Env. Coord. I</u>
D. Signature <u>Martin J. Stephenson</u>			E. Date of signature <u>03</u> <u>13</u> <u>91</u> MO. DAY YR.

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL
OR ENTER:

SITE NAME Wheeling-Pittsburgh Steel Corp.

Beech Bottom Plant

EPA ID NO.

W V D 0 0 0 7 0 7 7 2 0



U.S. ENVIRONMENTAL
PROTECTION AGENCY

1990
1989 Hazardous Waste Report

FORM
GM

WASTE GENERATION AND
MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec.
I

A. Waste description
Instruction Page 15

Waste water treatment sludge.

B. EPA hazardous waste code
Page 15

D 0 0 7

C. State hazardous waste code
Page 16

D. SIC code
Page 16

3 4 7 9

E. Source code
Page 16

A 2 1

F. Form code
Page 16

B 5 0 2

G. Origin
Page 16

Code 1

System type M

H. TFI constituent
Page 17

2

I. CAS numbers
Page 17

1. - - 2. - -

3. - - 4. - - 5. - -

Sec.
II

A. Quantity generated in ~~1988~~ 1989
Instruction Page 17

3 2 6

B. Quantity generated ~~1988~~ 1990
Page 17

3 5 8

C. UOM
Page 18

2

D. Density
Page 18

.
☐ 1 lb/gal ☐ 2 sg

E. Was this waste treated, disposed or recycled on site
or discharged to a sewer/POTW?
Page 18

☐ 1 Yes (CONTINUE TO SYSTEM 1)
☒ 2 No (SKIP TO SEC. III)

SYSTEM 1

System type
Page 18

M

Quantity treated, disposed or recycled in 1989
Page 18

SYSTEM 2

System type
Page 18

M

Quantity treated, disposed or recycled in 1989
Page 18

Sec.
III

A. Was this waste shipped off site?
Instruction Page 19

☒ 1 Yes (CONTINUE TO BOX B)
☐ 2 No (SKIP TO SEC. IV)

Site
1

B. EPA ID No. of facility to which waste was shipped
Instruction Page 19

O H D 9 8 0 5 6 8 9 9 2

C. System type
Page 19

M

D. Total quantity shipped in ~~1988~~ 1990
Page 19

3 2 2

Site
2

P A D 0 0 4 8 3 5 1 4 6

M

3 6

Sec.
IV

A. Waste minimization results in ~~1988~~ 1990
Instruction Page 20

☐ 1 Yes (CONTINUE TO BOX B)
☒ 2 No (THIS FORM IS COMPLETE)

B. Activity
Page 21

W W

W W

C. Other effects
Page 21

☐ 1 Yes

☐ 2 No

D. Quantity recycled in 1989 due to new activities
Page 21

E. Activity/Production Index
Page 21

.

F. Source Reduction Quantity
Page 22

Comments:

Page 2 of 3

BEFORE COPYING FORM, ATTACH SITE IDENTIFICATION LABEL OR ENTER:

SITE NAME

Wheeling-Pittsburgh Steel Corp.

Beech Bottom Plant

EPA ID NO.

WV D 0 0 0 7 9 7 7 2 0



U.S. ENVIRONMENTAL PROTECTION AGENCY

1990

1989 Hazardous Waste Report

FORM GM

WASTE GENERATION AND MANAGEMENT

INSTRUCTIONS: Read the detailed instructions beginning on page 14 of the 1989 Hazardous Waste Report booklet before completing this form.

Sec. I

A. Waste description
Instruction Page 16

Used paint rags generated from a paint line.

B. EPA hazardous waste code
Page 16

D 0 0 5 D 0 3 5

C. State hazardous waste code
Page 16

D. SIC code
Page 16

3 4 7 9

E. Source code
Page 16

A 2 1

F. Form code
Page 16

B 4 0 9

G. Origin
Page 16

Code 1

System type M

H. TRI constituent
Page 17

3

I. CAS numbers
Page 17

1. 1 3 3 0 - 2 0 - 1 7 2. 7 1 - 3 6 - 1 3

3. 4. 5.

Sec. II

A. Quantity generated in 1989
Instruction Page 17

1 9

B. Quantity generated in 1990
Page 17

5

C. UOM
Page 16

2

D. Density
Page 16

1 lb/gal 2 kg

E. Was this waste treated, disposed or recycled on site or discharged to a sewer/POTW?
Page 16

1 Yes (CONTINUE TO SYSTEM 1)
2 No (SKIP TO SEC. III)

SYSTEM 1

SYSTEM 2

System type
Page 16

M

Quantity treated, disposed or recycled in 1989
Page 16

System type
Page 16

M

Quantity treated, disposed or recycled in 1989
Page 16

Sec. III

A. Was this waste shipped off site?
Instruction Page 19

1 Yes (CONTINUE TO BOX B)
2 No (SKIP TO SEC. IV)

Site 1

B. EPA ID No. of facility to which waste was shipped
Instruction Page 19

P I A D I 0 1 8 1 5 1 6 1 9 1 0 1 5 1 9 1 2

C. System type
Page 19

M I 0 1 6 1 1

D. Total quantity shipped in 1990
Page 19

1 5

Site 2

M I

Sec. IV

A. Waste minimization results in 1990
Instruction Page 20

1 Yes (CONTINUE TO BOX B)
2 No (THIS FORM IS COMPLETE)

B. Activity
Page 21

W

W

C. Other effects
Page 21

1 Yes

2 No

D. Quantity recycled in 1989 due to new activities
Page 21

E. Activity/Production Index
Page 21

F. Source Reduction Quantity
Page 22

Comments: This waste stream is taken off-site and fuels blended.

Att F-5"

Hazardous Waste Emergency Response Fund
Fee Assessment Report

COMPANY NAME: Wheeling-Pittsburgh Steel Corp. EPA I.D. #: WVD000797720

GENERATOR LOCATION: Beech Bottom, W.Va.

1. The amount of hazardous wastes generated during the 1990 calendar year, excluding nonhazardous constituents. 1 Tons
2. The amount of hazardous wastes generated (from the amount determined in #1) that were treated or disposed of off-site, but remained hazardous. _____ Tons
3. The amount of hazardous wastes generated (from the amount determined in #1) that were treated or disposed of on-site, but remained hazardous. _____ Tons
4. The amount of hazardous wastes generated (from the amount determined in #1) that were treated off-site so that such wastes were rendered nonhazardous. _____ Tons
5. The amount of hazardous wastes generated (from the amount determined in #1) that were treated on-site so that such wastes were rendered nonhazardous. 1 Tons
6. Provide a brief narrative of the method(s) used to determine the amount given in #1, including method(s) used to determine the nonhazardous constituents.
7. If the total of items #2 through #5 is not equal to item #1, provide reasons for the difference.

CERTIFICATION:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who managed the system or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Martin J. Stephenson

Print or Type Name

Env. Coord. I

Title

Signature of Authorized
Representative

Date Signed

HAZARDOUS WASTE EMERGENCY RESPONSE FUND
FEE ASSESSMENT - 1990

Beech Bottom Plant

1. Waste Water Treatment Sludge

- Total weight shipped (Annual Report) 358 T
- Chromium hazardous constituent
assume 0.28% Cr from 1989 & 1990 Analysis
- Amount of hazardous constituents taken
off-site to become non-hazardous 1 T

OTO LOG

Company name WHEELING PITTSBURGH STEEL CORP Location UN R-2, BEACH BOTTOM
Facility name BEACH BOTTOM PLANT Stream _____

[illegible]

Photographer's signature J A BASTON

1. Photo number
- *2. Film description (type, ASA, expiration date)
- *3. Focal length of lens used
- *4. F-Stop, Shutter speed
5. Lighting conditions

6. Weather
7. Date/Time
8. Location
9. Brief description of photo

*Not necessary for instant development film

FILM TURNED OVER TO _____ FOR DEVELOPING ON _____
PHOTOGRAPHS WERE RECEIVED ON _____ FROM DEVELOPER _____